

United States District Court

EASTERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROBERT CARL WARD,

Defendant.

CRIMINAL COMPLAINT

Case No. 24-MJ-15-JAR

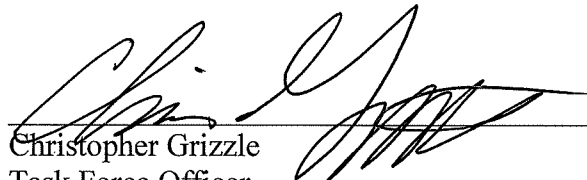
I, Christopher Grizzle, the undersigned complainant, state that the following is true to the best of my knowledge and belief.

On or about January 2, 2024, within the Eastern District of Oklahoma, ROBERT CARL WARD committed the crimes of **Possession of Methamphetamine with the Intent to Distribute** in violation of Title 21 United States Code, Sections 841(a)(1) and 841(b)(1)(A), and **Possession of a Firearm in Furtherance of a Drug Trafficking Crime** in violation of Title 18, United States Code, Section 924(c).

I further state that I am a Task Force Officer with the Bureau of Alcohol, Tobacco, Firearms and Explosives, and that this complaint is based on the following facts:


(See attached Affidavit of Christopher Grizzle which is attached hereto and made a part hereof by reference.)

☒ Continued on the attached sheet.


Christopher Grizzle
Task Force Officer
Bureau of Alcohol, Tobacco, Firearms and
Explosives

Sworn to on January 10, 2024.

JASON A. ROBERTSON
UNITED STATES MAGISTRATE JUDGE
Name and Title of Judicial Officer


Signature of Judicial Officer



AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Christopher Grizzle, being duly sworn, does depose and state the following:

AGENT BACKGROUND AND INTRODUCTION

1. I am an Investigator with the Sequoyah County Sheriff's Office and have been since 2019. During this employment I have served as an investigator and a full time Task Force Officer (TFO) with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF). Before being hired by the Sequoyah County Sheriff's Office in 2019, I served three years with the Cherokee County Sheriff's Office in Tahlequah, Oklahoma. I started my law enforcement career as a detention officer at the Sequoyah County Jail in the year 2000, and shortly thereafter, I attended reserve police academy in Sallisaw, Oklahoma in 2002, for the Sequoyah County Sheriff Office. Also, in 2002, I was a member of the Oklahoma Army National Guard, as an infantryman, and had several overseas deployments (combat and non-combat deployments).

2. In 2003, I successfully completed the Council on Law Enforcement Education and Training Academy as required by the State of Oklahoma for peace officer certification with the Sequoyah County Sheriff's Office. As a patrol deputy, I was involved in upholding the laws and statutes of the State of Oklahoma, limited to but not limited to traffic stops, paper service, court duties, making arrests and executing state search and arrest warrants. In 2005, I served in a humanitarian mission in Louisiana, during Hurricane Katrina, where I, as a team leader, coordinated rescue efforts, stabilization in the community and anti-looting efforts.

3. In 2006, I was deployed to Afghanistan during Operation Enduring Freedom as an embedded tactical trainer and was involved in excess of 150 combat missions and returned in May of 2007. In May of 2007, I was employed at the District 27 District Attorney's Office, where I mainly investigated highly complex narcotic distribution crimes, street crimes, as well as violent

crimes involving firearms. In 2012, I was employed with the Bureau of Indian Affairs as a police officer, where I enforced federal laws on Indian Reservations. In 2014, I Joined the Division of Drug Enforcement within the Bureau of Indian Affairs, where I only enforced federal drug laws on Indian Reservations and completed the Criminal Investigator Training Program (CITP) at the Federal Law Enforcement training Center in Glynco, Georgia.

4. In connection with my official duties as a Sequoyah County Investigator and ATF TFO, I investigate criminal violations of federal firearms laws, federal arson, explosives, and narcotics laws. I have been the affiant for numerous state search warrants. I have also been involved in multiple investigations over my career which have resulted in the seizure of controlled substances and firearms, resulting in the successful prosecution of those involved individuals.

5. During my career, I have received hundreds of hours of training, including training regarding the investigation of those who are involved in the illicit distribution of controlled substances and training regarding individuals who commit fraudulent acts. I have received training and have experience including, but not limited to, working in an undercover capacity, surveillance, management of confidential informants, drug-trafficking conspiracies, money laundering, organized criminal activity, burglary, larceny and homicide investigations, the preparation and execution of stolen property, firearm, and drug related search warrants and debriefing of informants and witnesses.

6. This affidavit is made for the limited purpose of establishing probable cause in support of a criminal complaint alleging that **ROBERT CARL WARD**, possessed with methamphetamine with the intent to distribute in violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A), and possessed a firearm in furtherance of a drug trafficking crime in violation of 18 U.S.C. § 924(c).

FACTS SUPPORTING PROBABLE CAUSE

7. On January 02, 2024, I, along with other law enforcement officers, assisted in the execution of a State Search Warrant at the residence of **ROBERT CARL WARD** (hereinafter “WARD”) located at 96076 South 4541 Road, in Vian, Oklahoma.

8. Upon arrival, officers knocked and announced their presence and received no response. Officers then made entry into the residence. Upon entry, law enforcement encountered a male and female in the back bedroom of the residence identified as **WARD** and Karen Avery. Both **WARD** and Avery were detained. TFO Grizzle, along with officers with the Sallisaw Police Department, oversaw clearing and securing the perimeter of the residence. All outbuildings on the curtilage were secured and cleared. No other persons were located on the property.

9. During the search of the residence, officers began their search in the back bedroom, where **WARD** and Avery were located. Located on the nightstand next to the bed (where **WARD** was encountered upon entry) was a plastic baggie containing a white crystalline substance. The substance was field-tested resulting in a positive reaction for the presence of methamphetamine and weighed approximately 27 grams. Located on the nightstand and next to the suspected methamphetamine was \$251.00 in cash and with multiple bags of a green leafy substance which appeared to be marijuana.

10. In the same bedroom where **WARD** was located, officers found another plastic baggie containing a white crystalline substance, which weighed approximately 27 grams, on top of the dresser. A Taurus Judge .45 caliber revolver that was loaded with five (5) rounds of .45 caliber ammunition was found in the top drawer of that dresser. Documents were observed on the same dresser in the name of Robert Ward and listed an address of 96076 S. 4541 Road, Vian,

Oklahoma 74962. Located in a box on the floor in front of the bed was a set of digital gram weight scales that were in working order.

11. Located in the closet of the back bedroom where **WARD** was found was a DPMS AR-15 .223 caliber rifle loaded with a 30-round magazine containing .223 ammunition. TFO Grizzle later learned that the DPMS AR-15 rifle was reported stolen out of Poteau, Oklahoma.

12. Located in a female's purse, black in color, were additional plastic bags containing a white crystalline substance and empty small plastic bags. The female's purse was found in the area where Avery was initially located.

13. Officers observed a green shed on the curtilage to the west side of the main residence with an extension cord running to it from the main residence. During the search of that green shed, officers located a small plastic baggie containing a white crystalline substance, as well as a glass mirror containing a loose crystalline substance underneath a small bed. Officers also found more than thirty (30) pistols, rifles, and shotguns, as well as large amounts of assorted ammunition. The ammunition was of all different calibers, kept within ammo canisters and various plastic containers in the green shed.

14. Officers observed a white shed on the curtilage just south of the main residence with an extension cord running to it from the main residence. During the search of the white shed, officers found a green Ozark Trail ice chest on a shelf. In the ice chest officers located two (2) gallon-size ziplock baggies containing a white crystalline substance and a dipping cup with white powder residue. Those two (2) ziplock bags weighed approximately 341.4 grams and 388.3 grams. The dipping cup was field-tested resulting in a positive reaction for the presence of methamphetamine. Officers also found inside the ice chest a set of digital gram-weight scales in working order, a plastic baggie containing empty plastic baggies, a plastic baggie containing a

green leafy substance which appeared to be marijuana, and a plastic baggie containing a yellow substance, a white rock like substance and a brown powder substance.

15. The green shed and the white shed at the property have clear walkways coming and going from the main residence occupied by **WARD**. The white shed located to the south of the residence has a door that requires a key. Inside the main residence, Officers found the key to the shed on **WARD's** keychain, along with the key to **WARD's** vehicle. Officers also located surveillance equipment at the residence which, based on my training and experience, is common with individuals engaging in drug trafficking activities.

16. All firearms, ammunition and suspected illegal substances were collected by deputies with the Sequoyah County Sheriff's Office and transported to their office for further processing. At the Sequoyah County Sheriff's Office, all firearms, ammunition, the white crystalline substance, and the plastic baggie containing the yellow substance, white rock like substance and brown powder substance were transferred to ATF Special Agent Madison Rebel. SA Rebel transported that evidence to the ATF Tulsa Office for processing.

17. The residence was secured, a copy of the State search warrant was left at the residence, and all Officers and Agents left the residence. **WARD** and Avery were transported to the Sequoyah County Detention Center for booking on State charges for Trafficking in a Controlled Dangerous Substance, Possession of a Firearm in Commission of a Felony, Possession of Marijuana, and Possession of Drug Paraphernalia.

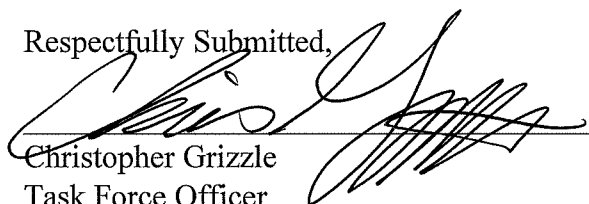
18. **WARD** has pending criminal charges for Kidnapping and Assault with a Dangerous Weapon in the District Court of Sequoyah County, Oklahoma in Case No. CF-2022-50.

19. Based upon my training and experience, the quantity of methamphetamine seized, the possession of drug paraphernalia such as digital scales and plastic baggies, and the possession of firearms while possessing large quantities of methamphetamine are indicative of intending to distribute methamphetamine and possessing firearms in furtherance of trafficking methamphetamine.

20. Since this affidavit is being submitted for the limited purpose of enabling a judicial determination of whether probable cause exists to justify the issuance of a criminal complaint for **WARD**, I have not included each and every fact known concerning this investigation to me and others involved in this matter. I have set forth only the facts that I believe are essential to establish the necessary foundation for a criminal complaint.

21. Based on the above and the totality of the circumstances, I believe that probable cause exists to issue a criminal complaint against **ROBERT CARL WARD** for Possession of Methamphetamine with the Intent to Distribute in violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A), and Possession of a Firearm in Furtherance of a Drug Trafficking Crime in violation of 18 U.S.C. § 924(c).

Respectfully Submitted,


Christopher Grizzle
Task Force Officer
Bureau of Alcohol, Tobacco, Firearms, and
Explosives (ATF)

Sworn to me this 10 day of January, 2024.



UNITED STATES MAGISTRATE JUDGE